

1 **DICKINSON WRIGHT PLLC**

JOHN L. KRIEGER (Nevada Bar No. 6023)

2 Email: JKrieger@dickinson-wright.com

3 HILARY A. WILLIAMS (Nevada Bar No. 14645)

Email: HWilliams@dickinsonwright.com

4 8363 West Sunset Road, Suite 200

Las Vegas, NV 89113

5 Telephone: (702) 550-4400

6 Fax: (844) 670-6009

7 **ONDERLAW, LLC**

JAMES R. DOWD (Missouri Bar No. 28818MO) (*Pro Hac Vice*)

8 Email: jim@dowdj.com

MATTHEW P. O'GRADY (Missouri Bar No. 47543MO) (*Pro Hac Vice*)

9 Email: mpo@onderlaw.com

110 East Lockwood, 2nd Floor

10 St. Louis, MO 63119

11 Telephone: (314) 963-9000

Fax: (314) 963-1700

12 *Attorneys for Plaintiff Ken Warren*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 KEN WARREN,

16 Plaintiff,

17 vs.

18 CARDOZA PUBLISHING, INC.,

19 and AVERY CARDOZA,

20 a/k/a ALLAN SILBERSTANG,

21 Defendant.

CASE NO: 2:17-cv-01100-JAD-GWF

**STIPULATION AND ORDER
EXTENDING THE DEADLINE TO
SUBMIT A PROPOSED JOINT
PRETRIAL ORDER**

[Fifth Request] ECF No. 107

22 Plaintiff Ken Warren ("Plaintiff") and Defendants Cardoza Publishing, Inc. and Avery
23 Cardoza a/k/a Allan Silberstang ("Defendants") (collectively "the Parties"), by and through their
24 respective counsel, hereby agree as follows:

25 (1) By Stipulation and Order, the current deadline for the Parties to file a proposed
26 joint pretrial order is April 15, 2019. (ECF No. 106.)

27 (2) The Parties seek one final extension for additional time to finalize the joint
28 pretrial order. The Parties have diligently been working on the joint pretrial order. Counsel for

1 the Parties met in person for two and a half hours on Monday, April 15, 2019, to identify and
2 confirm their list of stipulated exhibits; however, they each agreed they need additional time to
3 confer with their respective clients, finalize their stipulations and list of uncontested facts, and
4 reorganize the exhibits. No trial date has been set in the case. Accordingly, the Parties agree to
5 extend the deadline to file the proposed joint pretrial order one final time to this Friday, **April**
6 **19, 2019.**

7 (3) This is the fifth request to extend the deadline for the proposed joint pretrial order.
8 This extension is sought in good faith to accommodate the schedules of the Parties and their
9 counsel and is not requested for any improper purpose or delay.

10 DATED this 15th day of April, 2019.

DATED this 15th day of April, 2019.

11 **DICKINSON WRIGHT PLLC**

GUTKE LAW GROUP

12 /s/ John L. Krieger

/s/ John H. Gutke

13 John L. Krieger, Esq. (NV Bar No. 6023)

John H. Gutke, Esq. (NV Bar No. 10062)

14 Email: JKrieger@dickinson-wright.com

552 East Charleston Boulevard

15 Hilary A. Williams, Esq. (NV Bar No. 14645)

Las Vegas, NV 89104

16 Email: HWilliams@dickinson-wright.com

Telephone: (702) 766-1212

17 8363 West Sunset Road, Suite 200

Fax: (702) 825-0311

18 Las Vegas, NV 89113-2210

Email: john@gutkelaw.com

19 Telephone: (702) 550-4400

Attorney for Defendants

20 Fax: (844) 670-6009

- and -

21 **ONDERLAW, LLC**

22 JAMES R. DOWD

23 (Missouri Bar No. 28818MO) (*Pro Hac Vice*)

24 Email: jim@dowdj.com

25 MATTHEW P. O'GRADY

26 (Missouri Bar No. 47543MO) (*Pro Hac Vice*)

27 Email: mpo@onderlaw.com

28 110 East Lockwood, 2nd Floor

St. Louis, MO 63119

Telephone: (314) 963-9000

Fax: (314) 963-1700

Attorneys for Plaintiff

IT IS SO ORDERED:

United States District Judge

4-17-19

Dated: _____